

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

JOHN GUIDRY

CIVIL ACTION

versus

NO.: 6:21-cv-03994

NOBLE DRILLING (U.S.), LLC  
ET AL

DISTRICT JUDGE  
ROBERT R. SUMMERHAYS

MAGISTRATE JUDGE  
PATRICK J. HANNA

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**RESPONSE TO REMOVAL ORDER**

**NOW INTO COURT**, through undersigned counsel, comes Defendant Noble Drilling (U.S.), LLC (“Noble Drilling”), who, in connection with its Notice of Removal (Rec. Doc. No. 1) and in response to the Removal Order issued by the Court (Rec. Doc. No. 5), submits this pleading:

(1)(a) A list of all attorneys involved in the case and the parties they represent:

- John Craig Jones and Craig Ray Hill, counsel for Plaintiff, John Guidry
- Robert Kallam, Brad Schlotterer, Sean McLaughlin, Timothy Strickland, Stacey Norstrud, and Taylor Ashworth, counsel for Defendants Noble Drilling (US) LLC, Noble Drilling Holding LLC, and Noble Drilling Services LLC f/k/a Noble Drilling Services Inc.
- Thomas Diaz, Alex Baynham, and Vanessa Anseman, counsel for Defendants, Shell Oil Company and Shell Offshore Inc.

(1)(b) Copies or electronic images of all records and proceedings occurring in the State Court prior to removal, arranged by order of filing date

- See attached Exhibit “A.”

(1)(c) A list of all documents included in the State Court record, arranged by order of filing date

- Fax-filed Petition for Damages
- Fax-filed Request for Notice of Trial Date
- Fax-filed Proposed Order for Trial by Jury
- Letter
- Firm Check

- Fax Transmittal Sheet
- Receipt of Confirmation of filing of Petition for Damages, Request for Notice of Trial Date; Proposed Order for Trial by Jury
- Stamped Petition for Damages
- Stamped Request for Notice of Trial Date
- Stamped and Signed Order for Trial by Jury
- Stamped Letter
- Check Receipt
- Citation Noble Drilling Holding, LLC
- Citation Noble Drilling Services, Inc.
- Citation Noble Drilling (U.S.), LLC
- Citation Shell Offshore, Inc.
- Citation Shell Oil Company
- Citation Noble Leasing II (Switzerland) BmbH
- Letter
- Citation Return Shell Offshore, Inc.
- Citation Return Shell Oil Company
- Citation Return Noble Drilling Holding, LLC
- Citation Return Noble Drilling Services, Inc.
- Citation Return Noble Drilling (U.S.), LLC
- Notice of Filing of Removal with Attachments

(1)(d) A certificate by counsel that the above constitutes the entire State Court record

- See attached certificate Exhibit “B.”

(2)(a) No motions or exceptions were pending in State Court at the time of removal.

(2)(b) No registry funds were on file with the State Court.

Respectfully submitted:

**KEAN MILLER LLP**

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*Pro hac to be applied for*

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/s/ Taylor Ashworth

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ATTORNEYS FOR NOBLE DRILLING (U.S.), LLC AND NOBLE  
DRILLING SERVICES LLC F/K/A NOBLE DRILLING SERVICES  
INC. AND NOBLE DRILLING HOLDING LLC

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this the 8th day of December 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to those who are non-CM/ECF participants.

/s/ Taylor Ashworth